

# Exhibit B

**From:** [Layne Hilton](#)  
**To:** [Lockard, Victoria D. \(Shld-Atl-LT\)](#); [ruben@honiklaw.com](mailto:ruben@honiklaw.com)  
**Cc:** [DECValsartan@btlaw.com](mailto:DECValsartan@btlaw.com); [rgeman@lchb.com](mailto:rgeman@lchb.com); [mpatronella@classlawdc.com](mailto:mpatronella@classlawdc.com); [nmigliaccio@classlawdc.com](mailto:nmigliaccio@classlawdc.com); [kmadiraju@lchb.com](mailto:kmadiraju@lchb.com); [valpec@kirtlandpackard.com](mailto:valpec@kirtlandpackard.com); [David J. Stanoch](#); [Ostfeld, Gregory E. \(Shld-Chi-LT\)](#); [DTDorner@duanemorris.com](mailto:DTDorner@duanemorris.com); [DKlinges@duanemorris.com](mailto:DKlinges@duanemorris.com)  
**Subject:** [EXTERNAL]Re: Valsartan - Craft Deposition  
**Date:** Wednesday, January 5, 2022 5:52:55 PM

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Hi Victoria:

We hope that we can avoid the Court's intervention on this matter (especially because Plaintiffs' counsel will be participating remotely as well). However, if Ms. Craft's wishes remain the same by the next discovery CMC on January 18<sup>th</sup>, and Defendants have not confirmed whether they will assent to a fully remote deposition, please note that Plaintiffs will raise the issue with the Special Master at that time.

Best,

Layne

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**From:** "lockardv@gtlaw.com" <lockardv@gtlaw.com>  
**Date:** Wednesday, January 5, 2022 at 3:29 PM  
**To:** Layne Hilton <l.hilton@kanner-law.com>, "ruben@honiklaw.com" <ruben@honiklaw.com>  
**Cc:** "DECValsartan@btlaw.com" <DECValsartan@btlaw.com>, "rgeman@lchb.com" <rgeman@lchb.com>, "mpatronella@classlawdc.com" <mpatronella@classlawdc.com>, "nmigliaccio@classlawdc.com" <nmigliaccio@classlawdc.com>, "kmadiraju@lchb.com" <kmadiraju@lchb.com>, Valsartan PEC <valpec@kirtlandpackard.com>, "David J. Stanoch" <d.stanoch@kanner-law.com>, "OstfeldG@gtlaw.com" <OstfeldG@gtlaw.com>, "DTDorner@duanemorris.com" <DTDorner@duanemorris.com>, "DKlinges@duanemorris.com" <DKlinges@duanemorris.com>  
**Subject:** RE: Valsartan - Craft Deposition

Hi Layne,

We are discussing the request below among defense counsel, but given how quickly things change with these waves, we think it makes sense to revisit closer in time to the deposition.

Thanks, Victoria

**Victoria Davis Lockard**

Shareholder

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**From:** Layne Hilton <l.hilton@kanner-law.com>

**Sent:** Tuesday, January 4, 2022 5:04 PM

**To:** Ruben Honik <ruben@honiklaw.com>; Lockard, Victoria D. (Shld-Atl-LT) <lockardv@gtlaw.com>

**Cc:** DECValsartan@btlaw.com; rgeman@lchb.com; mpatronella@classlawdc.com; nmigliaccio@classlawdc.com; kmadiraju@lchb.com; valpec@kirtlandpackard.com; David J. Stanoch <d.stanoch@kanner-law.com>

**Subject:** Valsartan - Craft Deposition

Victoria:

I write regarding the deposition of Laura Craft.

Ms. Craft has requested that her deposition (set for February 9<sup>th</sup>) be conducted remotely via Zoom. While Ms. Craft was initially prepared personally appear for her deposition, given the current COVID case trajectory of the last few weeks, she no longer wishes to proceed in that manner. Ms. Craft has recently started caring for a newborn grandchild in the evenings, and she believes the risks are too high given the totality of the circumstances.

To respect her wishes, Plaintiffs will be appearing remotely as well.

Please confirm that Defendants will agree with this request.

Best,

Layne Hilton

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**From:** Layne Hilton

**Sent:** Wednesday, December 15, 2021 1:43 PM

**To:** Ruben Honik <[ruben@honiklaw.com](mailto:ruben@honiklaw.com)>; [lockardv@gtlaw.com](mailto:lockardv@gtlaw.com)

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**Subject:** RE: Deposition date for Dr. Kaplan - Med Mon

Victoria:

We confirm the following locations for the class expert depositions:

Conti: Boston, MA

Craft: Near Emeryville, CA (Bay Area)

Najafi: Near Alameda, CA (Bay Area)

Quick: Austin, TX

Panagos: Miami, FL  
Kaplan: Chicago, IL  
Song: Boston, MA

Thanks,

Layne

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**From:** Ruben Honik <[ruben@honiklaw.com](mailto:ruben@honiklaw.com)>  
**Sent:** Tuesday, December 14, 2021 12:23 PM  
**To:** [lockardv@gtlaw.com](mailto:lockardv@gtlaw.com)  
**Cc:** Layne Hilton <[l.hilton@kanner-law.com](mailto:l.hilton@kanner-law.com)>; [DECValsartan@btlaw.com](mailto:DECValsartan@btlaw.com); [rgeman@lchb.com](mailto:rgeman@lchb.com); [mpatronella@classlawdc.com](mailto:mpatronella@classlawdc.com); [nmigliaccio@classlawdc.com](mailto:nmigliaccio@classlawdc.com); [kmadiraju@lchb.com](mailto:kmadiraju@lchb.com); [valpec@kirtlandpackard.com](mailto:valpec@kirtlandpackard.com); David J. Stanoch <[d.stanoch@kanner-law.com](mailto:d.stanoch@kanner-law.com)>  
**Subject:** Re: Deposition date for Dr. Kaplan - Med Mon

We are not holding the following day for any of the experts and are proposing limiting the duration of the examination of several of these experts. Our position will be reflected in the agenda letter soon to be sent to the court and defense counsel.

Others on our team will address the remaining "logistical" questions you raise.

Ruben Honik, Esq.  
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On Dec 10, 2021, at 12:35 PM, [lockardv@gtlaw.com](mailto:lockardv@gtlaw.com) wrote:

We can set January 19<sup>th</sup> for Kaplan. Do you have dates for Conti?

Also can you confirm all the experts are holding the following day in case we need it?

Can you also confirm location for all?

**Victoria Davis Lockard**  
Shareholder

Greenberg Traurig, LLP | 3333 Piedmont Road NE | Suite 2500 | Atlanta, GA 30305  
Tel 678.553.2103 | Fax 678-553-2104  
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**From:** Layne Hilton <[l.hilton@kanner-law.com](mailto:l.hilton@kanner-law.com)>  
**Sent:** Monday, December 6, 2021 3:01 PM  
**To:** 'DECValsartan@btlaw.com' <[DECValsartan@btlaw.com](mailto:DECValsartan@btlaw.com)>  
**Cc:** [rgeman@lchb.com](mailto:rgeman@lchb.com); Mark Patronella <[mpatronella@classlawdc.com](mailto:mpatronella@classlawdc.com)>;  
[nmigliaccio@classlawdc.com](mailto:nmigliaccio@classlawdc.com); [kmadiraju@lchb.com](mailto:kmadiraju@lchb.com); [valpec@kirtlandpackard.com](mailto:valpec@kirtlandpackard.com);  
David J. Stanoch <[d.stanoch@kanner-law.com](mailto:d.stanoch@kanner-law.com)>  
**Subject:** [EXTERNAL]Deposition date for Dr. Kaplan - Med Mon

**\*EXTERNAL TO GT\***

Counsel:

We can provide either January 19<sup>th</sup> or February 2<sup>nd</sup> for Dr. Kaplan's deposition. Please let me know whether either of these dates works for Defendants.

Thanks,

Layne

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